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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

RICKY LEE KELLY,

Plaintiff,

vs.

JASON RYAN RALPHS, an Individual;
 THE CHURCH OF JESUS CHRIST OF
 LATTER-DAY SAINTS, a Utah Corporation
 Sole; DOES I through X; and ROE
 BUSINESS ENTITIES I through X,
 inclusive,

Defendants.

CASE NO.: 2:25-cv-00585-MMD-MDC

**AMENDED STIPULATION TO EXTEND
 TIME FOR DISCOVERY
 (First Request)**

COME NOW Plaintiff RICKY LEE KELLY, by and through his counsel of record, Amanda Harmon of the Law Offices of Kevin R. Hansen, and Defendants JASON RYAN RALPHS and THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS, by and through their counsel of record, Matthew Pruitt of Kirton McConkie (Plaintiff and Defendants collectively “Parties”), and hereby stipulate to extend time for discovery by sixty (60) days. This is the first stipulation to extend time for discovery.

All Parties stipulate to this extension as the Parties require additional time for responding to written discovery, taking depositions, and the Parties’ experts will require additional time to prepare reports after reviewing discovery.

1 The Parties have presently completed the following discovery: All Parties have served
2 Initial Disclosures, and All Parties have served Written Discovery Requests, with responses
3 pending.

4 The Discovery which remains to be completed includes: Third-Party Subpoenas,
5 Depositions of Plaintiff and Defendants, Depositions of Medical Providers, Expert Reports, and
6 Expert Depositions.

7 The remaining discovery is not able to be completed in the original time limits of the
8 discovery plan, as the Parties require additional time to accommodate the schedules of deponents
9 and experts so that the case may be fully decided on its merits.

10 More specifically, Plaintiff's medical expert requires additional time to review the
11 medical records, as there are over 3,000 pages to review. Additionally, Defendants' expert has
12 indicated that it needs 60-90 days to complete an expert report. Moreover, the Parties are
13 attempting in good faith to schedule depositions, and anticipate being able to take those
14 depositions soon, but the parties' experts will need time to review the party and medical provider
15 deposition transcripts prior to the expert disclosure deadline. Furthermore, Defendants will be
16 serving third-party subpoenas shortly for medical records which it anticipates may add to the
17 3,000 page review.

18 Present Discovery Deadlines include:

19 (1) Discovery Cut-Off: September 26, 2025

20 (2) Expert Disclosures: July 29, 2025

21 (3) Rebuttal Expert Disclosures: August 28, 2025

22 (4) Dispositive Motion Deadline: October 27, 2025

23 (5) Joint Pre-Trial Order: November 26, 2025

24 (6) Amending the Pleadings and Adding Parties: June 30, 2025

The Parties therefore stipulate to the following new deadlines:

- (1) Discovery Cut-Off: November 26, 2025
- (2) Expert Disclosures: September 29, 2025
- (3) Rebuttal Expert Disclosures: October 28, 2025
- (4) Dispositive Motion Deadline: December 29, 2025
- (5) Joint Pre-Trial Order: January 26, 2026

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/s/ Amanda Harmon

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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: 7-11-25